

(Submitted via Internet Nov. 7, 2001)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for p-methyl styrene.

We agree with Deltech Corporation that no further tests are needed on this chemical because an abundant amount of data was generated in the late 70s and early 80s on ecotoxicity, reproduction, and development and repeat dosing. Also numerous and well-conducted genotoxicity tests were performed.

While Environmental Defense believes that further toxicity tests need not be performed, concerns remain regarding occupational and environmental exposures. We therefore recommend that p-methyl styrene exposures be monitored on a regular basis so that human exposures do not exceed safe exposure levels keeping in mind that OSHA PELs are likely too high.

Thank you for this opportunity to comment.

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